



**Sprint Nextel**  
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October 10, 2012

***Via Electronic Filing***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, DC 20554

**Re: *Ex Parte Presentation***

*Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands, WT Docket No. 12-70; Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz, 2000-2020 MHz and 2180-2200 MHz, ET Docket No. 10-142; Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands, WT Docket No. 04-356.*

Dear Ms. Dortch,

On October 5, 2012, Stephen Bye, Chief Technology Officer and Vice President of Technology Development and Strategy; Lawrence Krevor, Vice President, Government Affairs; Richard Engelman, Director, Government Affairs; the undersigned, all of Sprint Nextel Corporation ("Sprint"); and Marc Martin of K&L Gates, counsel to Sprint, held a conference call with John Leibovitz, Tom Peters, Chris Helzer, Janet Young, Blaise Scinto, Peter Daronco, and Jeremy Marcus of the Wireless Telecommunications Bureau and Michael Ha of the Office of Engineering and Technology.

During the call, Sprint reiterated points it has made in the record of the above-captioned proceedings, including its recent *ex parte* filings.<sup>1</sup> Sprint also considered questions posed by Commission staff, as discussed below, regarding the appropriate interference protection levels that terrestrial AWS-4 operations should provide to Sprint's PCS G Block (1910-1915 MHz and 1990-1995 MHz) and the PCS H Block (1915-1920 MHz and 1995-2000 MHz). The Middle Class Tax Relief and Job Creation Act of 2012 directs the Federal Communications Commission (the "Commission") to auction the H Block by February 2015.

Sprint emphasized that its two primary concerns in this proceeding remain that (1) there be no diminution in protection for the G Block, and (2) the H Block is established as viable spectrum for mobile broadband services. Sprint reaffirmed that if its concerns are satisfactorily addressed, Sprint will facilitate the completion of all remaining 3<sup>rd</sup> Generation Partnership Project ("3GPP") 2 GHz standards work as expeditiously as possible – assuming that DISH likewise agrees to facilitate the 3GPP

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<sup>1</sup> Letter from Stephen Bye, Chief Technology Officer and Vice President of Technology Development and Strategy, and Lawrence R. Krevor, Vice President, Legal and Government Affairs – Spectrum, Sprint Nextel, to Julius Genachowski, Chairman, FCC, WT Docket Nos. 12-70 and 04-356 and ET Docket No. 10-142 (filed Oct. 2, 2012); Letter from Marc S. Martin, K&L Gates, Counsel for Sprint Nextel, to Marlene H. Dortch, Secretary, FCC, WT Docket Nos. 12-70 and 04-356 and ET Docket No. 10-142 (filed Oct. 2, 2012).

standards process with respect to the 2 GHz S Band, and the PCS H and G Blocks. Sprint reiterates this commitment herein.<sup>2</sup>

In the course of the meeting, Commission staff asked Sprint whether an out-of-band-emissions (OOBE) limitation of  $70+10 \log(P)$  dB for AWS-4 operations at the 2000 MHz band edge; i.e., -40 dBm, would be consonant with Sprint's primary concerns about not diminishing the protection in the G Block. Sprint responded it would need time to study and evaluate the staff's proposal, but that it appeared promising.

Sprint's evaluation of the staff's proposal suggests that a Commission-mandated AWS-4 OOBE requirement of  $70+10 \log(P)$  at the 2000 MHz H Block band edge, coupled with the existing limits in 3GPP standard TS 36.101 for frequencies below 1990 MHz, would not diminish existing interference protection for PCS G Block user equipment from AWS-4 user equipment. If the Commission adopts this requirement, *and in doing so* indicates that real-world spurious emissions from AWS-4 are expected to be less than -40 dBm (in order to achieve the required -50 dBm level at 1990 MHz and below), Sprint would accept the work DISH initiated within 3GPP to revise the protection levels from AWS-4 user equipment operations into the G Block to a level of -40 dBm.<sup>3</sup>

Moreover, the staff proposal referenced above should produce a broadband-viable H Block, provided the Commission imposes reasonable OOBE limits for H Block base station transmissions vis-à-vis the AWS-4 spectrum. This result would reflect the reality that all affected parties, including prospective H block licensee(s), should cooperate to obtain optimal use of these spectrum assignments without causing harmful interference.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Lawrence R. Krevor

Lawrence R. Krevor  
Vice President, Legal and Government  
Affairs -- Spectrum

/s/ Rafi Martina

Rafi Martina  
Counsel, Legal and Government Affairs

cc: John Leibovitz  
Tom Peters  
Chris Helzer  
Janet Young

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<sup>2</sup> In an October 10, 2012 *ex parte* filing, DISH asserted that Sprint is delaying the 3GPP process through the use of certain "tactics." Sprint intends to respond to DISH's inaccurate assertion in a separate *ex parte* filing.

<sup>3</sup> In other words, Sprint respectfully submits that Commission adoption of AWS-4 and H Block technical rules, as discussed above, will directly facilitate resolution of the 3GPP matter.

Blaise Scinto  
Peter Daronco  
Jeremy Marcus  
Michael Ha